

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>GENOVA BURNS LLC</b> Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstolz@genovaburns.com dclarke@genovaburns.com gkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel for the Official Committee of Talc Claimants</i>	<b>BROWN RUDNICK LLP</b> David J. Molton, Esq. Michael S. Winograd, Esq. dmolton@brownrudnick.com mwinograd@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801  Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Eric R. Goodman, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com egoodman@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
<b>MASSEY &amp; GAIL LLP</b> Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i>	<b>OTTERBOURG PC</b> Melanie L. Cyganowski, Esq. Richard G. Haddad, Esq. Adam C. Silverstein, Esq. Jennifer S. Feeney, Esq. David A. Castleman, Esq. mcyganowski@otterbourg.com rhaddad@otterbourg.com asilverstein@otterbourg.com jfeeney@otterbourg.com dcastleman@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
In re:  <b>LTL MANAGEMENT LLC,<sup>1</sup></b>  Debtor.	Chapter 11  Case No.: 23-12825 (MBK)  Honorable Michael B. Kaplan  Hearing Date: September 7, 2023, 10:00 a.m.

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF MOTION OF THE AD HOC COMMITTEE OF CERTAIN TALC CLAIMANTS AND THE OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR ALLOWANCE OF ADMINISTRATIVE CLAIMS FOR REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM APRIL 4, 2023 THROUGH APRIL 14, 2023 (PRIOR TO THE FORMATION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS) THAT PROVIDED A SUBSTANTIAL CONTRIBUTION IN THE DEBTOR’S CASE OR, IN THE ALTERNATIVE, AUTHORIZING RETENTION OF THE TCC PROFESSIONALS EFFECTIVE AS OF THE PETITION DATE**

**PLEASE TAKE NOTICE** that the Ad Hoc Committee of Certain Talc Claimants and the Official Committee of Talc Claimants (the “TCC”) of LTL Management LLC, (“LTL” or the “Debtor”), by and through the TCC’s counsel, shall move, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608 on *September 7, 2023 at 10:00 a.m.*, seeking entry of an order, substantially in the form submitted with this motion, the allowance of administrative claims for reimbursement of expenses incurred for the period from April 4, 2023 through April 14, 2023 (prior to the formation of the Official Committee of Talc Claimants) that provided a substantial contribution in the Debtor’s case or, in the alternative, authorizing retention of the TCC professionals effective as fo the Petition Date.

**PLEASE TAKE FURTHER NOTICE** that, the TCC shall rely upon the application filed herewith in support of the relief sought by this Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application filed with the Motion.

**PLEASE TAKE FURTHER NOTICE** that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

**PLEASE TAKE FURTHER NOTICE**, that all objections, if any, must be made at least seven (7) days prior to the hearing date, in accordance with the Court’s order entered with respect

to the Dismissal of the within Chapter 11 Case, and shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: August 17, 2023

**GENOVA BURNS LLC**

By: /s/ Daniel M. Stolz

Daniel M. Stolz, Esq.

Donald W. Clarke, Esq.

Gregory S. Kinoian, Esq.

110 Allen Rd., Suite 304

Basking Ridge, NJ 07920

Tel: (973) 467-2700

Fax: (973) 467-8126

Email: [DStolz@genovaburns.com](mailto:DStolz@genovaburns.com)

[DClarke@genovaburns.com](mailto:DClarke@genovaburns.com)

[GKinoian@genovaburns.com](mailto:GKinoian@genovaburns.com)

*Proposed Local Counsel for the Official  
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